

The FCC's proposed rulemaking which would require broadcast stations to record and retain programming would place an undue burden on KERO-TV. As an ABC affiliate in the 130th market, our small station works to serve the public trust each day with local news and community-oriented programming. Additionally, we are one of the few remaining television stations in the nation to offer editorials with a call to action on issues of local importance. We do these things with a very small staff, and operate each year under increased pressure from competitors, declining audiences and increased regulations, all of which make it more difficult for us to survive. The costs of recording and storing thousands of hours of broadcast programming would require equipment, tapes and personnel that we do not have, nor would be able to add. That expense would force us to look for expense savings in other areas. Expense savings that would directly impact our ability to serve the public trust with local news and information. Further, this rule would place an undue burden on us for recording every multicast channel stream on our digital signal. This proposed rule would be in effect only to help the FCC enforce restrictions on obscene, indecent and profane broadcasting. KERO does none of that, never has, and never will. In fact, the percentage of broadcasters who've been determined by the FCC to have violated the indecency statute is so extremely small, that imposing this rule borders on the ridiculous. Sincerely,

Craig Jahelka

Vice President/General Manager

KERO-TV